

Exhibit 43

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

ISLAMIC INTERNATIONAL BRIGADE (IIB)

[UN un.org/securitycouncil/sanctions/1267/aq_sanctions_list/summaries/entity/islamic-international-brigade-\(iib\)](https://un.org/securitycouncil/sanctions/1267/aq_sanctions_list/summaries/entity/islamic-international-brigade-(iib))

Submitted by Anonymous (not verified) on 27 June 2018 - 6:29pm

In accordance with paragraph 13 of resolution 1822 (2008) and subsequent related resolutions, the ISIL (Da'esh) and Al-Qaida Sanctions Committee makes accessible a narrative summary of reasons for the listing for individuals, groups, undertakings and entities included in the ISIL (Da'esh) and Al-Qaida Sanctions List.

QDe.099

ISLAMIC INTERNATIONAL BRIGADE (IIB)

Date on which the narrative summary became available on the Committee's website:

7 September 2010

Reason for listing:

The Islamic International Brigade (IIB) was listed on **4 March 2003** pursuant to paragraphs 1 and 2 of resolution 1390 (2002) as being associated with Al-Qaida, Usama bin Laden or the Taliban for “participating in the financing, planning, facilitating, preparing or perpetrating of acts or activities by, in conjunction with, under the name of, on behalf or in support of” Al-Qaida (QDe.004).

Additional information:

The Islamic International Brigade (IIB) was founded and led by Shamil Salmanovich Basayev (deceased) and is linked to the Riyadus-Salikhin Reconnaissance and Sabotage Battalion of Chechen Martyrs (RSRSBCM) (QDe.100) and the Special Purpose Islamic Regiment (SPIR) (QDe.101).

On the evening of 23 October 2002, members of IIB, RSRSBCM and SPIR operated jointly to seize over 800 hostages at Moscow’s Podshipnikov Zavod (Dubrovka) Theater. The attackers threatened that unless the Russian Government met their demands they would kill the hostages. They said that they were prepared to kill themselves and the hostages by blowing up the theater. One hundred and twenty-nine hostages died during the rescue mounted by the Government of the Russian Federation.

Basayev, the then leader of both RSRSBCM and IIB, subsequently publicly claimed responsibility for the attack on behalf of RSRSBCM. Basayev’s claim was supported by a videotape broadcast on Al Jazeera during the Dubrovka Theater incident showing one of the

perpetrators identifying himself as a member of the “Sabotage and Military Surveillance Group of the Riyadh al-Salikhin Martyrs”, which is an alias for RSRBCM.

IIB was led by Basayev and the late Saudi national Ibn al-Khattab. Its members include fighters from Chechnya as well as from Arab states.

IIB and SPIR and their leaders are closely linked and have cooperated from the period between the two Chechen wars (1997-1999) until the present. While its existence was unknown prior to the Dubrovka Theater incident, RSRBCM has drawn its members and leaders from IIB and SPIR. In addition to their participation in the 23 October 2002 terrorist attack on the Dubrovka Theater, IIB, SPIR and RSRBCM have been linked to other terrorist attacks, or have threatened terrorist attacks, against both civilian and government targets.

Numerous ties link the leadership of these entities with Al-Qaida (QDi.004), the Taliban and Usama bin Laden (deceased). In October 1999, emissaries of Basayev and Al-Khattab traveled to Usama bin Laden’s home base in the Afghan province of Kandahar, where Bin Laden agreed to provide substantial military assistance and financial aid, including by making arrangements to send to Chechnya several hundred fighters to fight against Russian troops and perpetrate acts of terrorism. Later that year, Bin Laden sent substantial amounts of money to Basayev, Movsar Barayev (leader of SPIR) and Al-Khattab, which was to be used exclusively for training gunmen, recruiting mercenaries and buying ammunition. Following the death of Al-Khattab, Abu al-Walid became a key leader of IIB with Basayev. Before his death in December 2002, Abu al-Walid’s deputy, Abu Tariq, who was also involved in channeling funds from foreign sources to Chechen extremists, had received several million dollars from international terrorist organizations, including Al-Qaida.

Al-Khattab (while leader of IIB) publicly admitted that he spent the period between 1989 and 1994 in Afghanistan and that he had met Bin Laden. In March 1994, Basayev arrived in Afghanistan and toured fighter training camps in Khost province. He returned to Afghanistan with the first group of Chechen militants in May 1994. Basayev underwent training in Afghanistan and had close connections with Al-Qaida. Several hundred Chechens eventually trained in Al-Qaida camps in Afghanistan. With Al-Qaida’s financial support, Al-Khattab also mobilized fighters from Ingushetia, Ossetia, Georgia and Azerbaijan to fight in Chechnya and Dagestan. By August 1995, substantial numbers of those fighting against Russian troops were “Afghan Arabs” (Arabs who had combat experience in Afghanistan against Soviet troops). The support was often reciprocated. Al-Qaida’s select “055 Brigade,” which fought against the Northern Alliance in Afghanistan, included a number of Chechens, many of whom were believed to be followers of Basayev, Barayev and Al-Khattab. In October 2001, Al-Khattab sent additional fighters to Afghanistan and promised to pay the volunteers’ families a substantial monthly stipend or a large lump-sum payment in the event of their death. In 2002, Al-Qaida was attempting to raise USD 2 million to support Abu al-Walid, who had succeeded Ibn al-Khattab in the leadership of IIB as the new Arab Chechen leader.

Related listed individuals and entities:

Al-Qaida (QDe.004), listed on 6 October 2001

Riyadus-Salikhin Reconnaissance and Sabotage Battalion of Chechen Martyrs (RSRSBCM) (QDe.100), listed on 4 March 2003

Special Purpose Islamic Regiment (SPIR) (QDe.101), listed on 4 March 2003

Bilal bin Marwan (QDi.009), listed on 25 January 2001